

# UNITED STATES BANKRUPTCY COURT

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NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

In re:

Jinnie Jinhuei Chang Chao, Debtor

Chapter 11

Case No. 15-31519

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**FILED**

**JUN 18 2025**

U.S. BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA

## **MOTION TO DISALLOW UNAPPROVED ATTORNEY FEES AND COSTS**

TO THE HONORABLE COURT, THE UNITED STATES TRUSTEE, AND ALL INTERESTED PARTIES:

Debtor Jinnie Jinhuei Chang Chao respectfully moves the Court to disallow and strike the final invoice in the amount of \$192,652.33 issued by Miller Nash LLP and attorney Bernard Kornberg, for the following reasons:

1. Debtor filed this Chapter 11 case in 2015.
2. The Court authorized the retention of Bernard Kornberg and Miller Nash LLP ("Attorney") for limited representation in Adversary Proceeding 16-03023.
3. The Court approved an initial retainer and limited fees of \$25,000.
4. At no time did Attorney file a subsequent fee application or request for approval of additional compensation as required by Bankruptcy Rule 2016(a) and 11 U.S.C. §§ 327–330.
5. The adversary proceeding was dismissed by stipulation in May of 2025.
6. On June 11, 2025, Attorney sent Debtor a final invoice totaling \$192,652.33, including:
  - \$136,817 in post-mediation fees
  - \$24,941.40 in costs
  - \$56,576.43 in pre-mediation fees
  - Credit of only \$25,000, despite an additional \$25,000 payment made by Debtor.

## **LEGAL BASIS FOR DISALLOWANCE**

7. Under Bankruptcy Rule 2016(a), all attorneys seeking compensation must file a fee application.

8. Under 11 U.S.C. § 330(a), the Court must approve all compensation.

9. No such application was ever filed, and post-dismissal demand is improper.


REQUEST FOR RELIEF

Debtor respectfully requests that the Court:

1. Disallow the unauthorized \$192,652.33 fee claim.
2. Require an accounting of all retainers paid.
3. Order disgorgement of any improperly collected fees.
4. Enjoin further collection attempts.

Dated: June 14, 2025

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jinnie Jinhuei Chang Chao". The signature is fluid and cursive, with the first name "Jinnie" being particularly prominent.

Jinnie Jinhuei Chang Chao  
30 Pilarcitos Court  
Hillsborough, CA 94010